

UNITED STATES BANKRUPTCY COURT

FOR THE

EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

In re: :  
Azim Feda : Chapter 7  
Debtor : Case No. 12-12001  
: :  
\_\_\_\_\_

**DEBTORS' ANSWER TO MOTION TO REOPEN**

**Debtor, through undersigned counsel, responds to the Motion to Reopen  
filed by Mustafa Wafa as follows:**

1. The Debtor does not oppose the Motion to Reopen for the purpose of filing an Adversary Proceeding to determine dischargeability of the purported debt owed to Mustafa Wafa.
2. The allegations of paragraphs 1, 2, 5, 6, 10, 11 and 16 are admitted.
3. The debtor is not able to admit or deny the allegations of paragraphs 7, 8, 9, 12, 13, 14 and 15.
4. The debtor denies the allegations of paragraphs 3 and 4. The “note” was signed more than a year before any Motion to Convert was filed; furthermore, the debtor was functioning as a guarantor of a loan to Edward Marin and the debtor did not personally receive the funds referenced in the

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Counsel for Defendant

“note” (see attachments).

**WHEREFORE, the Debtor does not oppose the Motion to Reopen so that the Movant may file an Adversary Proceeding to determine the dischargeability of the purported debt owed to Mustafa Wafa.**

**Dated: March 30, 2015**

**Respectfully Submitted**  
**Azim Feda**  
**By Counsel:**  
/s/ Nathan Fisher  
**Nathan Fisher**  
**3977 Chain Bridge Rd., #2**  
**Fairfax, VA 22030**  
**(703) 691-1642**  
**VSB #37161**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY that on this 30th day of March 2015, I served the foregoing, via first-class mail, on the following, who are all necessary parties under Local Rule 4001(a)-1(E)(1):**

**Gregory Counts, Esq.  
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**Office of the U.S. Trustee  
115 South Union Street, Ste. 210  
Alexandria, VA 22314**

**/s/ Nathan Fisher  
Nathan Fisher**